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By ECF

July 6, 2024

MEMO ENDORSED

SO ORDERED:

The Honorable Paul G. Gardephe United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Paul G. Gardenher U.S.D.

Dated:

Re:

U.S. v. Shadell McBride

22 Cr. 484 (PGG) 23 Cr. 204 (PPG)

Dear Judge Gardephe:

This letter is respectfully submitted to request that Mr. McBride be released from custody for 4-5 hours on Thursday, July 11, 2024, to attend the viewing and/or funeral of his grandmother. Mr. McBride was very close to his grandmother. He would like to be able to pay his respects.

The funeral will be held at the Greater Holy Tabernacle Church, 3780 Third Avenue, Bronx, NY 10456. The viewing will be held from 3-7pm on July 11<sup>th</sup>. The funeral service will be held on the same day from 7-9pm. Mr. Mc Bride would be grateful for the opportunity to say goodbye to his grandmother at any time Your Honor thinks appropriate in light of the time it takes to travel from the MDC, where Mr. McBride is housed, to the Church and back.

If Your Honor grants this request, Mr. McBride will be transported and accompanied at all times by Michael Egan, a former NYPD First Grade Detective. Mr. Egan served in the NYPD for more than 20 years. He is now a licensed private investigator.

I have been informed by Assistant United States Attorney Jacob Fiddelman that the Government opposes this request. Mr. Fiddelman also informed me that the Marshal's Service does not escort inmates to funerals.

Respectfully submitted,

/s/Andrew Patel

Andrew G. Patel

All Counsel by ECF

cc: